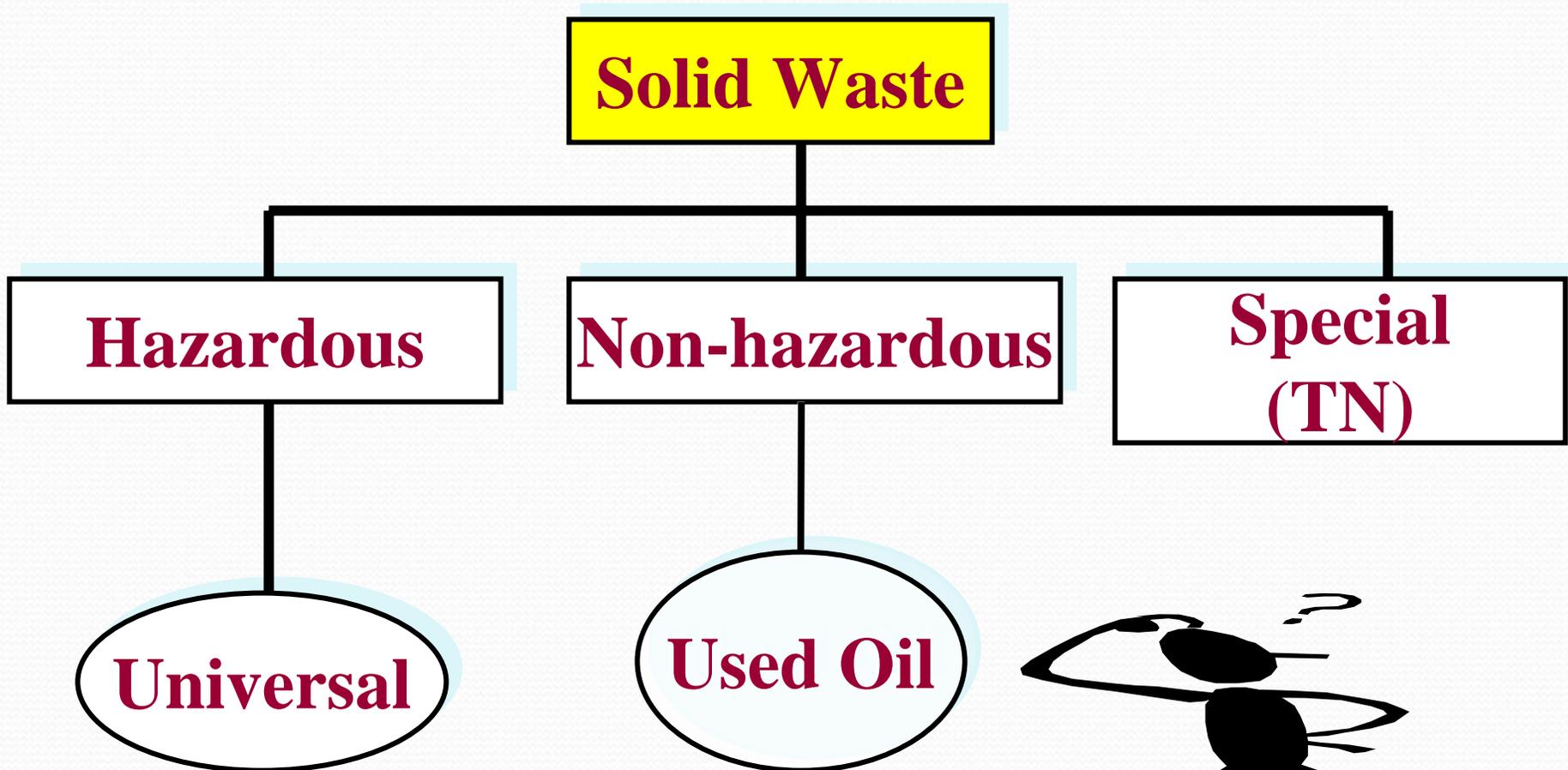
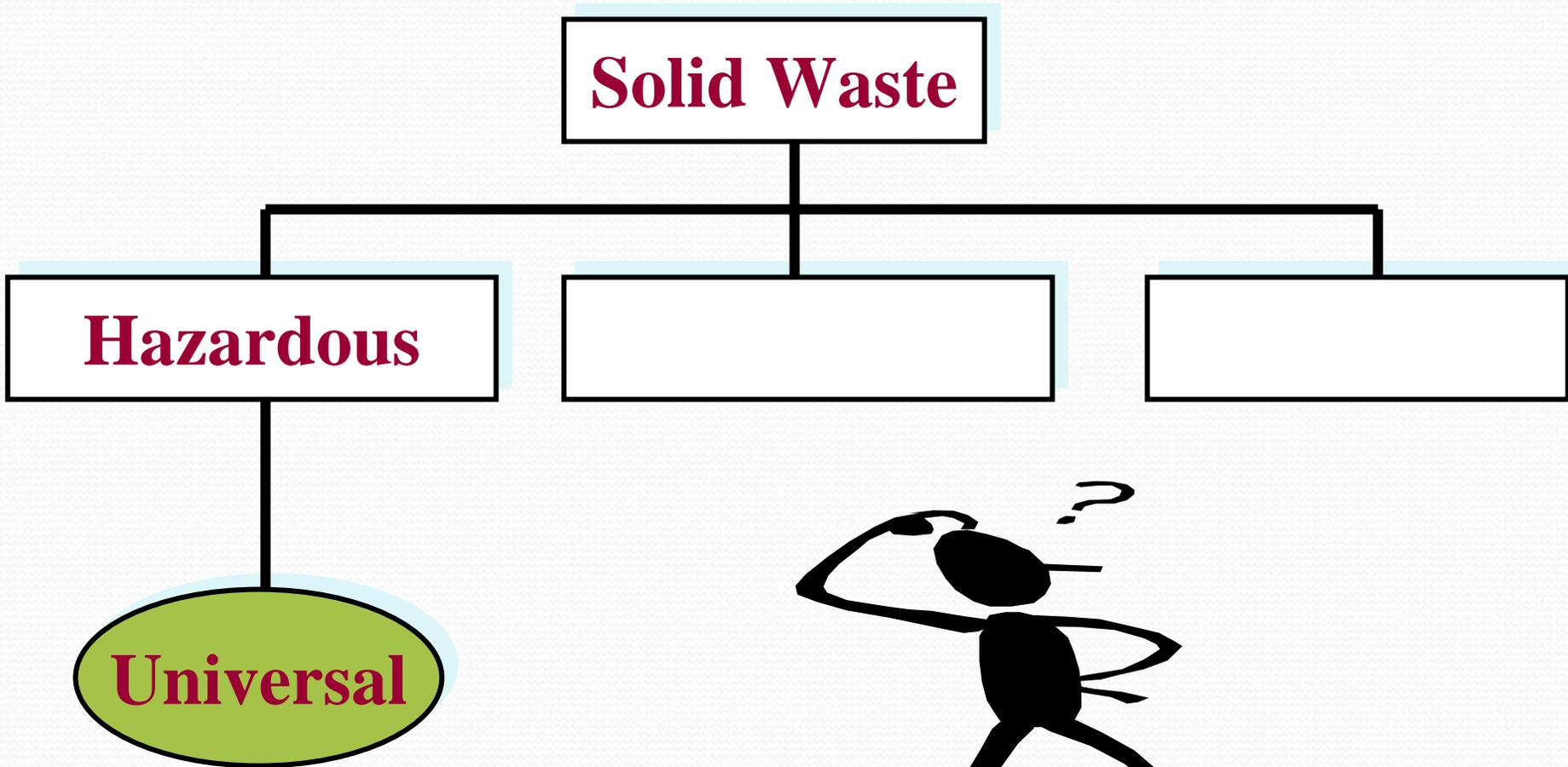


US EPA ARCHIVE DOCUMENT

# RCRA Regulated - Which Category?



# RCRA Regulated - Which Category?



# Universal Wastes

- Batteries
- Agricultural pesticides
- Mercury Containing Equipment\*
- Mercury Lamps



# Universal Waste

- The Regulated Community:
  - Generator
    - Large Quantity Handler  $\geq 5000$  kg
    - Small Quantity Handler  $< 5000$  kg
  - Transporter
  - Destination Facility

# Universal Waste Management

- General requirements for generators:
  - Accumulation
  - Labeling
  - Storage and handling
  - Notifications
  - Employee training
  - Release response
  - Shipping and tracking

# Accumulation Time

- One year
- Longer if facilitates recovery, treatment, or disposal
- Must prove time of accumulation

# Universal Waste Labels

- **Universal Waste** - Battery(ies)  
Pesticide(s)  
Mercury Containing Equipment  
Mercury Lamps
- **Waste** Battery(ies)  
Pesticide(s)  
Mercury Containing Equipment  
Mercury Lamp(s)
- **Used** Battery(ies)  
Mercury Containing Equipment  
Mercury Lamp(s)

# Storage and Handling

- Storage containers must be labeled
- Batteries may be sorted, cell casings should remain intact
- For thermostats, mercury ampules may be removed\*
- Mercury lamps may be crushed for volume control\*

\* **Note:** Several safety and health operating conditions apply



# Notification Requirements

- Not required for small quantity handler of universal waste
- Required for large quantity handler that does not already have EPA ID number (Notification must be written, if required)

# Notification Requirements

- Notification and permit-by-rule not required for crushing if small and large quantity handler:
  - crushes bulbs on site of generation
- Destination facilities and transporters who crush for volume reduction must notify

# Training Requirements

- Small quantity handler:
  - must inform employees of proper handling and emergency procedures, **except mercury containing equipment (must ensure)**
- Large quantity handler:
  - must ensure employees are thoroughly familiar with proper handling and emergency procedures

# Responses to Releases

- Immediately contain all releases and residues
- Make waste determinations on spill/residues
- Dispose of material properly (e.g. hazardous residues from spill clean ups)

# Shipping Requirements

- Must package and ship per DOT requirements including use of manifests
- Send only to another handler or destination facility
- Ensure that receiving facility agrees to receive shipment

# Tracking Requirements

- All generators of Universal Wastes must keep track- who, what, when, where.....

# Pharmaceuticals

- At Issue:
- Definition of generator
  - Facility or specific care units

# Pharmaceuticals

- At Issue:
- Definition of used or waste, but non-used
- Red bag vs. yellow bag material

- 
- At Issue:
  - Areas of inspection
    - Storage areas vs. care units

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- At Issue:
  - Reverse distribution/recalls